

**Coleman, Charles**

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**From:** Coleman, Charles  
**Sent:** Monday, September 25, 2017 4:00 PM  
**To:** 'Levia Shoutis'  
**Cc:** Chavez, Joel  
**Subject:** RE: slag proppant

Levia,

The Mill Creek site that is proposed for the Premier operations was previously capped (six inches of soil) in anticipation of future redevelopment. Any excavation or disturbance of this cap requires removal of contaminated materials or the replacement of a permanent cover. Any excess contaminated material not capped would also need to be removed to the development repository. These activities require a Development Permit from Anaconda-Deer Lodge County.

I'm not sure if the smelter, when operating, was regulated under RCRA. Only after the smelter was shut down and then later listed on the NPL did Superfund direct activities at the site.

Charlie

-----Original Message-----

**From:** Levia Shoutis [mailto:Levia.Shoutis@erm.com]  
**Sent:** Monday, September 25, 2017 3:28 PM  
**To:** Coleman, Charles <COleman.Charles@epa.gov>  
**Cc:** Chavez, Joel <jchavez@mt.gov>  
**Subject:** RE: slag proppant

Hi Charlie,

I had another question on the Premier site in Anaconda. Was this site part of the Superfund remediation, and if so, what type of remediation occurred? (was the site capped, or was soil removed and replaced?). What restrictions would there be for digging at the site and handling of soils? (ie depth). In addition to Superfund, was the site also regulated by RCRA?

Thanks,

Levia Shoutis

ERM  
1 Ninth Street Island Drive | Livingston, MT | 59858 M 406-570-6194

-----Original Message-----

**From:** Coleman, Charles [mailto:COleman.Charles@epa.gov]  
**Sent:** Friday, July 21, 2017 1:27 PM  
**To:** Levia Shoutis  
**Cc:** Chavez, Joel  
**Subject:** RE: slag proppant

Levia,

I believe that Premier obtained a Development Permit from Anaconda-Deer Lodge County in order to break ground and conduct limited activities.

The scope of a Superfund slag operation and management plan will be focused on how slag from the site is handled, transported, stored and/or disposed such that it is not released into the environment or injures the existing remedy. Facility operation plans, for the actual processing of slag to produce pig iron and/proppant would be those as required by other regulating entities in order to permit the facility (i.e., DEQ, RCRA, etc.).

Charlie

-----Original Message-----

From: Levia Shoutis [mailto:Levia.Shoutis@erm.com]  
Sent: Friday, July 21, 2017 12:49 PM  
To: Coleman, Charles <COleman.Charles@epa.gov>  
Subject: RE: slag proppant

Hi Charlie,

I pushed send too quickly on my last email- so the letter you sent is from 2015. Premier would still have had to had provided EPA their plan of operations for approval prior to breaking ground, correct? Do you have this latest approval?

Levia Shoutis

ERM  
1 Ninth Street Island Drive  
Livingston, MT 59047  
M 406-570-6194  
E levia.shoutis@erm.com | W www.erm.com

-----Original Message-----

From: Coleman, Charles [mailto:COleman.Charles@epa.gov]  
Sent: Friday, July 21, 2017 7:28 AM  
To: Levia Shoutis  
Subject: FW: slag proppant

Levia,

Attached is EPA's letter indicating that slag may be used to produce pig iron and proppant. As stated in the letter, Premier will need to obtain all necessary permits to site, develop and operate a facility. That permitting process is outside of Superfund and regulated by the normal State and Federal programs with jurisdiction over this type of proposed facility. Additionally, Activities on Superfund properties must be approved by EPA, DEQ and Anaconda-Deer Lodge County and be consistent with or protective of the current remedy.

Charlie

-----Original Message-----

From: Coleman.Charles@epamail.epa.gov [mailto:COleman.Charles@epamail.epa.gov]  
Sent: Friday, July 21, 2017 2:16 AM  
To: Coleman, Charles <COleman.Charles@epa.gov>  
Subject: slag proppant

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre.

Attachment File Type: PDF

## Coleman, Charles

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E levia.shoutis@erm.com | W www.erm.com

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Sent: Friday, July 21, 2017 2:16 AM

To: Coleman, Charles <COleman.Charles@epa.gov>

Subject: slag proppant

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## Coleman, Charles

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**From:** Coleman, Charles  
**Sent:** Friday, July 21, 2017 9:28 AM  
**To:** 'Levia Shoutis'  
**Subject:** FW: slag proppant  
**Attachments:** DOC.PDF

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Charlie

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## Coleman, Charles

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**From:** Levia Shoutis <Levia.Shoutis@erm.com>  
**Sent:** Thursday, July 20, 2017 4:08 PM  
**To:** Hallauer, Lori  
**Cc:** Coleman, Charles  
**Subject:** Premier Industries- Plan of Operations EPA approval

Hi Lori,

I am requesting the official record of EPA's approval of the Plan of Operations for Premier Industries slag processing facility in Anaconda. The permittee name may be FX Solutions Inc, Rick Tabish. I just left you a message about this as well.

Charlie- I left you a message today about this but realized I should likely go through Lori. Please let me know if there are any additional EPA approvals, permits, or consultations that the facility is going to require. I would also like to request those.

Thanks in advance,

*Levia Shoutis*

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1 Ninth Street Island Drive  
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